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August 1, 2025

VIA ECF

Honorable Judge Natasha Merle
United District Court Judge
Eastern District of New York
1 Federal Plaza
Central Islip, New York 11722

Re: *Government Employees Insurance Co., et al. v. Harbor Medical Group, P.C. et al.*
RR File No.: 5100-3244
Docket No. 2:23-cv-09038(NCM)(AYS)

Dear Judge Merle:

As you are aware, this firm represents Plaintiffs (collectively, "GEICO") in the above-referenced matter. GEICO respectfully submits this letter partially supplementing diversity jurisdiction pursuant to the Court's June 17, 2025 Order.

Defendant Financial Vision Group LLC was formed in Delaware. Its members are Alexandr Zaitsev MD ("Zaitsev"), a New Jersey domiciliary, Daniel Kandhorov ("Kandhorov"), a New York domiciliary, FHJ Vision Partners LLC ("FHJ Vision"), and FBH Capital Group LLC ("FBH Capital"). See Exhibit 1. FHJ Vision was formed in New York. Its members are Howard Fensterman ("H. Fensterman"), Frank Carone ("Carone"), and Jordan Fensterman ("J. Fensterman"), all of whom are New York domiciliaries. FBH Capital was formed in Delaware. Plaintiffs do not yet have information regarding the members of FBH Capital.

Defendant Financial Vision Group II LLC f/k/a ADF Equities LLC was formed in Delaware. Its members are FHJ Vision and FBH Capital, discussed above, and Kandhorov, also discussed above. See Exhibit 1.

Defendant Financial Vision Group III LLC was formed in Delaware. Its members are Zaitsev, Kandhorov, FHJ Vision, and FBH Capital. See Exhibit 1.

Financial Vision Group IV LLC was formed in Delaware. Its members are Zaitsev, Kandhorov, DMC Capital Group LLC ("DMC Capital"), and FBH Capital. See Exhibit 1. DMC Capital was formed in New York. Its members are the Frank Carone Dynasty Trust, H. Fensterman, Reverend Monsignor Jamie J. Gigantiello, Steven Bamundo, WSS Realty LLC, NREG Consulting Services

LLC¹, and Croton Management LLC. Plaintiffs are not yet able to establish domicile for the Frank Carone Dynasty Trust. H. Fensterman, Reverend Monsignor Jamie J. Gigantiello, and Steven Bamundo are all New York Domiciliaries.

WSS Realty LLC was formed in Florida. Its members are Thomas Sedita, Sam Barretta a/k/a Santo Barretta, who are Florida domiciliaries, and Ralph Woythaler, who is now deceased but was previously a Florida domiciliary. NREG Consulting Services LLC was formed in Florida. Its sole member is Sam Barretta a/k/a Santo Barretta, a Florida domiciliary. Croton Management LLC was formed in New York. Its members are Michael Weiss and Jon Weiss, both of whom are New York domiciliaries.

Plaintiffs issued document subpoenas seeking information regarding domicile to FBH Capital and the Frank Carone Dynasty Trust on July 10, 2025, both of which were returnable on July 24, 2025. On July 21, 2025, Abrams, Fensterman, Eisman, Formato, Wolf & Carone, L.L.P. (“Abrams Fensterman”) accepted service of both subpoenas. Abrams Fensterman recently informed Plaintiffs they will be unable to comply with the August 1, 2025 deadline set by the Court for completion of jurisdictional discovery. See Ord. Dtd. June 17, 2025. Plaintiffs therefore, with the consent of all Parties, request a brief extension to August 14, 2025 to complete jurisdictional discovery. This is Plaintiffs’ first request for an extension and will not impact any other deadlines in this matter, including the August 17, 2025 deadline to file a letter supplementing discovery in this matter. See Ord. Dtd. June 17, 2025.

Thank you for your attention to this matter.

Very truly yours,

RIVKIN RADLER LLP
/s/ Joanna Rosenblatt
Joanna Rosenblatt

Cc: All Counsel (via ECF)

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¹ The operating agreement for DMC Capital erroneously identifies “NREG Consulting LLC” as a member, however the correct name of the entity is NREG Consulting Services LLC.